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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KERRY L. HUMPHRIES,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 3:17-CV-00362-RCJ-VPC

**UNOPPOSED MOTION FOR
EXTENSION OF TIME AND PROPOSED
ORDER
(DEFENDANT'S FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her response to Plaintiff's motion for summary judgment and cross motion for summary judgment, due on December 27, 2017, by 30 days, through and including January 26, 2018.

An extension of time is needed in order to prepare Defendant's response and cross motion because my mother passed away recently and I was out of the office for extended periods this month. As a result, I am attempting to catch up on my workload, but still have a brief due on December 27,

1 2017, in the Northern District of California, as well as one due on December 28, 2017, in the Eastern
2 District of California, both of which have had multiple extensions.

3 This request is made in good faith with no intention to unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel, Cyrus Safa by email on December 20,
5 who has no opposition to this motion.

6 Respectfully submitted this 20th day of December 2017.

8 STEVEN W. MYHRE, NVBN 9635
United States Attorney

9 /s/ Richard M. Rodriguez
10 RICHARD M. RODRIGUEZ
Special Assistant United States Attorney

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15 IT IS SO ORDERED:

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17 The Honorable Valerie P. Cooke
UNITED STATES MAGISTRATE JUDGE

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20 DATED: December 22, 2017
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CERTIFICATE OF SERVICE

I, **Richard M. Rodriguez**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

Cyrus Safa, Esq.
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Dated this 20th day of December, 2017

/s/ Richard M. Rodriguez
RICHARD M. RODRIGUEZ
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